

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Jonathan B. New
Robertson D. Beckerlegge
Robyn M. Feldstein

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Adv. Pro. No. 10-04283 (SMB)

STEVEN B. MENDELOW, NANCY
MENDELOW, CARA MENDELOW, PAMELA
CHRISTIAN, C&P ASSOCIATES, LTD., and
C&P ASSOCIATES, INC.,

Defendants.

**STIPULATION SETTING THE BRIEFING SCHEDULE FOR THE
TRUSTEE'S MOTION FOR LEAVE TO AMEND**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein,
that the briefing schedule for the Trustee's Motion for Leave to Amend will be as follows:

1. The Trustee will file his Motion for Leave to Amend, ("the "Motion") attaching
the Proposed Amended Complaint on December 30, 2015;
2. The Defendants' Opposition to the Motion will be due on February 1, 2016;
3. The Trustee's Response to the Defendants' Opposition will be due on February
15, 2016;

IT IS FURTHER STIPULATED AND AGREED, that the oral argument on this Motion
shall be heard by the Court on February 24, 2016 at 10:00 am.

This briefing schedule is stipulated to without prejudice. The parties reserve all rights,
claims, defenses and objections they may have, and entry into this Stipulation shall not impair or
otherwise affect such rights, claims, defenses and objections they may have.

This Stipulation may be signed by the parties in any number of counterparts, each of
which when so signed shall be an original, but all of which shall together constitute one and the
same instrument.

Dated as of: November 17, 2015

BAKER & HOSTETLER LLP

By: s/ Jonathan B. New
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Jonathan B. New
Email: jnew@bakerlaw.com
Robertson Beckerlegge
Email: rbeckerlegge@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

ARKIN SOLBAKKEN LLP

By: s/ Stanley S. Arkin Esq.
590 Madison Avenue
#3500
New York, New York 10022
Telephone: 212.333.0200
Facsimile: 212.333.2350
Stanley S. Arkin
Email: sarkin@arkin-law.com
Lisa C. Solbakken
Email: lsolbakken@arkin-law.com
Alexander Reisen
Email: areisen@arkin-law.com

*Attorneys for Defendants Steven B.
Mendelow, Nancy Mendelow, Cara
Mendelow, Pamela Mendelow, C&P
Associates, Ltd., and C&P Associates, Inc.*